

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
TITLE V PERMIT**

**TO OPERATE AIR EMISSIONS EQUIPMENT**

**THIS CERTIFIES THAT**

Nautic Star LLC  
500 Waterway Drive  
Amory, Mississippi  
Monroe County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

**Permit Issued: XXXXX**

**Effective Date: As specified herein.**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**

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**AUTHORIZED SIGNATURE  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires:[Date not to exceed 5 yrs from issuance]**

**Permit No.: 1840-00025**

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### **APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

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## SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.
- (a) This permit shall be reopened and revised under any of the following circumstances:
- (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
  - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
  - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
  - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

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- (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G)

- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission

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factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)
  - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)
  - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
- 1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:

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- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

- 1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 Nothing in this permit shall alter or affect the following:
  - (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
  - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

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- (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

- 1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

- 1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

- 1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

- (a) the changes are not modifications under any provision of Title I of the Act;
- (b) the changes do not exceed the emissions allowable under this permit;
- (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
  - (i) a brief description of the change(s),
  - (ii) the date on which the change will occur,
  - (iii) any change in emissions, and
  - (iv) any permit term or condition that is no longer applicable as a result of the change;

- (d) the permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

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- 1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)
- 1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
- (a) routine maintenance, repair, and replacement;
  - (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
  - (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
  - (d) use of an alternative fuel or raw material by a stationary source which:
    - (i) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
    - (ii) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
  - (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was

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established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

(f) any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.

(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:

(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source,

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including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
  - (i) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - (ii) the permitted facility was at the time being properly operated;
  - (iii) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
  - (iv) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

- (a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
  - (1) For an upset, the Commission may pursue an enforcement action for

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noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

- (i) An upset occurred and that the source can identify the cause(s) of the upset;
  - (ii) The source was at the time being properly operated;
  - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
  - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
  - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.
- (2) In any enforcement proceeding by the Commission, the source seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.
  - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- (b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- (i) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.

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- (ii) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
- (iii) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

- 1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities. (Ref.: 11 Miss Admin. Code Pt. 2, R. 1.8.)

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**SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES**

<b>Emission Point</b>	<b>Description</b>
<b>AA-000</b>	<b>Entire Boat Manufacturing Facility</b>
<b>AA-100</b>	<b>Boat Spray-Up, Molding, and Assembly Operations</b>
AA-101	Spray-Up Operations consisting of four (4) spray booths for gel coat application. Includes gel coat mixing and application equipment cleaning activities.
AA-102	Molding Operations which are performed in the open plant area. Open plant area has a ventilation rate of approximately 125,000 ft <sup>3</sup> /min. Includes resin mixing and application equipment activities.
AA-103	Assembly Operations consisting of five (5) booths for sanding and polishing. Assembly operations also include carpet and accessory installation.
AA-104	Research and Development Operations consisting of one (1) spray booth.

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**SECTION 3. EMISSION LIMITATIONS & STANDARDS**

**A. Facility-Wide Emission Limitations & Standards**

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
- (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

**B. Emission Point Specific Emission Limitations & Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-000	11 Miss. Admin. Code Pt. 2, R. 1.3.A. 11 Miss. Admin. Code Pt. 2, R. 1.3.B.	3.A.1 3.A.2	Opacity	40% Opacity
	11 Miss. Admin. Code Pt. 2, R. 6.3.A(1).	3.B.1	VOC	249.0 tpy
AA-100	40 CFR Part 63, Subpart VVVV (§63.5683(a) and §63.5689)	3.B.2	HAP	Applicability
AA-101 AA-102	40 CFR Part 63, Subpart VVVV (§63.5698(a -b) and §63.5779)	3.B.3		Organic HAP limit based on the following equation:  HAP Limit = 46(M <sub>R</sub> ) + 159(M <sub>PG</sub> ) + 291(M <sub>CG</sub> ) + 54(M <sub>TR</sub> ) + 214(M <sub>TG</sub> )

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Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-101 AA-102	40 CFR Part 63, Subpart VVVV (§63.5734(a))	3.B.4	HAP	For routine flushing, use a cleaning solvent with no more than 5% organic HAPs by weight. There is no organic HAP limit for solvents used to remove cured resin or gel coat
AA-103	40 CFR Part 63, Subpart VVVV (§63.5740(a))	3.B.5		Use carpet and fabric adhesives that contain no more than 5% organic HAP by weight

3.B.1 For the entire facility (AA-000), the permittee shall limit the emissions of Volatile Organic Compounds (VOCs) to no more than 249.0 tons per year for each consecutive 12-month period on a rolling basis. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(1).)

3.B.2 Emission Point AA-100 is subject to and shall comply with all applicable requirements of 40 CFR Part 63, Subpart VVVV – National Emissions Standards for Hazardous Air Pollutants for Boat Manufacturing. (Ref.: 40 CFR 63.5683(a) and 63.5689)

3.B.3 For Emission Points AA-101 and AA-102, the permittee must limit the emissions of organic HAPs from the following open molding operations as defined below:

- Production Resin - Any resin used to manufacture parts for sale. Production resins do not include tooling resins used to build or repair molds, or assembly adhesives as defined in §63.5779.
- Pigmented Gel Coat - Opaque gel coats used to manufacture parts for sale. Pigmented gel coats do not include tooling gel coats used to build or repair molds.
- Clear Gel Coat - Gel coats that are clear or translucent so that underlying colors are visible. Clear gel coats are used to manufacture parts for sale. Clear gel coats do not include tooling gel coats used to build or repair molds.
- Tooling Resin - The resin used to build or repair molds (also known as tools) or prototypes (also known as plugs) from which molds will be made.
- Tooling Gel Coat - The gel coat used to build or repair molds (also known as tools) or prototypes (also known as plugs) from which molds will be made

The permittee shall limit the emissions from the open molding operations defined above to the organic HAP limit specified by the equation below:

$$\text{(Eqn. 1) HAP Limit} = 46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})$$

Where:

- HAP Limit = total allowable organic HAP that can be emitted from the open molding operations in kilograms.

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- $M_R$  = mass of production resin used in the past 12 months, excluding any materials exempt under §63.5698(d), in megagrams.
- $M_{PG}$  = mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under §63.5698(d), in megagrams.
- $M_{CG}$  = mass of clear gel coat used in the past 12 months, excluding any materials exempt under §63.5698(d), in megagrams.
- $M_{TR}$  = mass of tooling resin used in the past 12 months, excluding any materials exempt under §63.5698(d), in megagrams.
- $M_{TG}$  = mass of tooling gel coat used in the past 12 months, excluding any materials exempt under §63.5698(d), in megagrams.

(Ref.: 40 CFR 63.5698(a-b) and 63.5779)

3.B.4 For Emission Points AA-101 and AA-102, the permittee shall use a cleaning solvent which contains no more than 5 percent organic HAPs by weight when performing routine flushings of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushes, rollers, squeegees, etc.). When removing cured resin or gel coat from application equipment, there is no organic HAP content limit. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid. (Ref.: 40 CFR 63.5734(a))

3.B.5 For Emission Point AA-103, the permittee shall only use carpet and fabric adhesives which contain no more than 5 percent organic HAP by weight. (Ref.: 40 CFR 63.5740(a))

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

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D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-101 AA-102	40 CFR Part 63, Subpart VVVV (§63.5731(a) and (b))	3.D.1	HAP	Mixing containers must have a cover with no visible gaps
	40 CFR Part 63, Subpart VVVV (§63.5734(b))	3.D.2		Solvent storage standards for solvents used to remove cured resin or gel coat

- 3.D.1 For Emission Points AA-101 and AA-102, the permittee must have a cover with no visible gaps in place at all times for all resin and gel coat mixing containers with a capacity greater than or equal to 208 liters, including containers used for on-site mixing of putties and poly-putties. This standard does not apply when materials are being manually added or removed from a container or when mixing or pumping equipment is being placed into or being removed from a container. (Ref.: 40 CFR 63.5731(a) and (b))
- 3.D.2 For Emission Points AA-101 and AA-102, the permittee must store all organic HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 7.6 liters, the distance from the top of the container to the solvent surface must be no less than 0.75 times the diameter of the container. Containers that store organic HAP-containing solvents used for removing cured resin or gel coat are exempt from the requirements of 40 CFR Part 63, Subpart T. (Ref.: 40 CFR 63.5734(b))

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#### SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

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## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

### A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (b) the date(s) analyses were performed;
  - (c) the company or entity that performed the analyses;
  - (d) the analytical techniques or methods used;
  - (e) the results of such analyses; and
  - (f) the operating conditions existing at the time of sampling or measurement.
- (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)
- 5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)
- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

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5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

**B. Specific Monitoring and Recordkeeping Requirements**

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.B.1	VOC	Monitor and record the quality and quantity of VOC containing materials used and calculate the emissions of VOCs
AA-101 AA-102 AA-103	40 CFR Part 63, Subpart VVVV (§63.5758(a))	5.B.2	HAP	Determination of organic HAP contents
AA-101 AA-102 AA-103	40 CFR Part 63, Subpart VVVV (§63.5767(a-c) and 63.5770)	5.B.3		Recordkeeping requirements
AA-101 AA-102	40 CFR Part 63, Subpart VVVV (§63.5704(a))	5.B.4		Emissions Averaging Option requirements
	40 CFR Part 63, Subpart VVVV (§63.5707)	5.B.5		Implementation Plan requirements
	40 CFR Part 63, Subpart VVVV (§63.5710)	5.B.6		Demonstration of compliance with the Emissions Averaging Option
	40 CFR Part 63, Subpart VVVV (§63.5714)	5.B.7		Filled resin compliance demonstration
	40 CFR Part 63, Subpart VVVV (§63.5731(c-d))	5.B.8		Resin and gel coat mixing compliance
	40 CFR Part 63, Subpart VVVV (§63.5737)	5.B.9		Resin and gel coat application equipment cleaning compliance demonstration
AA-103	40 CFR Part 63, Subpart VVVV (§63.5740(b))	5.B.10		Carpet and fabric adhesive compliance demonstration

5.B.1 For the entire facility (AA-000), the permittee shall determine and maintain sufficient records to document the following information for each coating, adhesive, solvent, or other VOC containing material:

- (a) The identification of each coating, adhesive, solvent, or other VOC containing material used;
- (b) The quantity used (in gallons or pounds); and

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(c) The percentage of VOCs by weight;

The permittee may utilize data supplied by the manufacturer or analysis of VOC content by EPA Test Method 24, 40 CFR 60, Appendix A.

The permittee shall calculate the emissions of VOCs from these materials on a monthly basis and shall compile a 12-month rolling total to demonstrate compliance with Condition 3.B.1. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.2 For Emission Points AA-101, AA-102, and AA-103, in order to determine the organic HAP content for each material used the permittee must use one of the options specified in paragraphs (a) through (f) below.

(a) Method 311 (Appendix A to 40 CFR Part 63) – The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in subparagraphs (i) and (ii) below when determining organic HAP content by Method 311.

(i) Include in the organic HAP total each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the permittee does not need to include it in the organic HAP total. Express the mass fraction of each organic HAP measured as a value truncated to four places after the decimal point (for example, 0.1234).

(ii) Calculate the total organic HAP content in the test material by adding up the individual organic HAP contents and truncating the result to three places after the decimal point (for example, 0.123).

(b) Method 24 (Appendix A to 40 CFR Part 60) – The permittee may use Method 24 to determine the mass fraction of non-aqueous volatile matter of aluminum coatings and use that value as a substitute for mass fraction of organic HAP.

(c) ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins) - The permittee may use ASTM D1259-85 (available for purchase from ASTM) to measure the mass fraction of volatile matter of resins and gel coats for open molding operations and use that value as a substitute for mass fraction of organic HAP.

(d) Alternative method – The permittee may use an alternative test method for determining mass fraction of organic HAP if the permittee obtains prior approval by the MDEQ. The permittee must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(e) Information from the supplier or manufacturer of the material – The permittee may rely on information other than that generated by the test methods specified in

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paragraphs (a) through (d) of this condition, such as manufacturer's formulation data, according to subparagraphs (i) through (iii) below.

- (i) Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the permittee does not have to include it in the organic HAP total.
  - (ii) If the organic HAP content is provided by the material supplier or manufacturer as a range, then the permittee must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a) through (d) of this condition exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then the permittee must use the measured organic HAP content to determine compliance.
  - (iii) If the organic HAP content is provided as a single value, the permittee may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of the total organic HAP content using the methods specified in paragraphs (a) through (d) of this condition is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the permittee may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then the permittee must use the measured organic HAP content to determine compliance.
- (f) Solvent blends - Solvent blends may be listed as single components for some regulated materials in certifications provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP content of the materials. When detailed organic HAP content data for solvent blends are not available, the permittee may use the values for organic HAP content that are listed in Table 5 or 6 to Subpart VVVV. The permittee may use Table 6 to Subpart VVVV only if the solvent blends in the materials used do not match any of the solvent blends in Table 5 to Subpart VVVV and it is known only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in Table 5 or 6 to Subpart VVVV, then the test results must be used for determining compliance.

(Ref.: 40 CFR 63.5758(a))

5.B.3 For Emission Points AA-101, AA-102, and AA-103, the permittee shall keep the records outlined by paragraphs (a) through (c) below:

- (a) The permittee must keep a copy of each notification and report that was submitted

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to comply with Subpart VVVV.

- (b) The permittee must keep all documentation supporting any notification or report that was submitted.
- (c) The permittee must keep the records of the total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, the permittee must also record the amounts of each applied by atomized and non-atomized methods.

These records must be readily available and in a form so they can be easily inspected and reviewed. The permittee must keep each record for 5 years following the date that each record is generated. Each record must be kept on site for at least 2 years after the date that each record is generated. The records may be kept off-site for the remaining 3 years. The records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche.

(Ref.: 40 CFR 63.5767(a-c) and 63.5770)

5.B.4 For Emission Points AA-101 and AA-102, the permittee shall demonstrate compliance with the open molding limitations from Condition 3.B.3 by complying with the Emissions Averaging Option outlined in paragraphs (a) through (e) below:

- (a) Use the methods specified in Condition 5.B.2 to determine the organic HAP content of resins and gel coats.
- (b) Complete the calculations described in Condition 5.B.6 to show that the organic HAP emissions do not exceed the limit specified in Condition 3.B.4.
- (c) Keep records as specified in subparagraphs (i) through (iv) below for each resin and gel coat.
  - (i) Hazardous air pollutant content;
  - (ii) Amount of material used per month;
  - (iii) Application method used for production resin and tooling resin. This record is not required if all production resins and tooling resins are applied with non-atomized technology; and
  - (iv) Calculations performed to demonstrate compliance based on MACT model point values, as described in Condition 5.B.6.
- (d) Prepare and submit the Implementation Plan described in Condition 5.B.5 to the MDEQ and keep it up to date.
- (e) Submit semiannual compliance reports to the MDEQ as specified in Condition 5.C.3.

(Ref.: 40 CFR 63.5704(a))

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5.B.5 For Emission Points AA-101 and AA-102, the permittee shall comply with the following Implementation Plan requirements:

- (a) A description of each operation included in the average;
- (b) The maximum organic HAP content of the materials used, the application method used (if any atomized resin application methods are used in the average), and any other methods used to control emissions; and
- (c) Calculations showing that the operations covered by the plan will comply with the open molding emission limit specified in §63.5698.

The permittee must keep the Implementation Plan on-site and provide it to the MDEQ upon request. If the Implementation plan is revised, an updated copy shall be submitted to the MDEQ along with the semiannual compliance report specified in Condition 5.C.3. (Ref.: 40 CFR 63.5707)

5.B.6 For Emission Points AA-101 and AA-102, compliance using the Emissions Averaging Option, as outlined in Condition 5.B.4, is demonstrated on a 12-month rolling-average basis and is determined at the end of every month (12 times per year). At the end of the twelfth month and at the end of every subsequent month, use the equation below to demonstrate that the organic HAP emissions from those operations included in the average do not exceed the emission limit in Condition 3.B.3 calculated for the same 12-month period. (Include the terms in Equation 1 from Condition 3.B.3 and Equation 1 below for only those operations and materials included in the average.)

$$\text{(Eqn. 1) HAP Emissions} = (\text{PV}_R)(\text{M}_R) + (\text{PV}_{PG})(\text{M}_{PG}) + (\text{PV}_{CG})(\text{M}_{CG}) + (\text{PV}_{TR})(\text{M}_{TR}) + (\text{PV}_{TG})(\text{M}_{TG})$$

Where terms  $M_R$ ,  $M_{PG}$ ,  $M_{CG}$ ,  $M_{TR}$ , and  $M_{TG}$  are the same as in Equation 1 from Condition 3.B.3, and where:

- HAP emissions = Organic HAP emissions calculated using MACT model point values for each operation included in the average in kilograms.
- $PV_R$  = Weighted-average MACT model point value for production resin used in the past 12 months in kilograms per megagram.
- $PV_{PG}$  = Weighted-average MACT model point value for pigmented gel coat used in the past 12 months in kilograms per megagram.
- $PV_{CG}$  = Weighted-average MACT model point value for clear gel coat used in the past 12 months in kilograms per megagram.
- $PV_{TR}$  = Weighted-average MACT model point value for tooling resin used in the past 12 months in kilograms per megagram.
- $PV_{TG}$  = Weighted-average MACT model point value for tooling gel coat used in the past 12 months in kilograms per megagram.

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At the end of every month, use Equation 2 below to compute the weighted-average MACT model point value for each open molding resin and gel coat operation included in the average.

(Eqn. 2) 
$$PV_{OP} = \frac{\sum_{i=1}^n (M_i PV_i)}{\sum_{i=1}^n (M_i)}$$

Where:

- $PV_{OP}$  = weighted-average MACT model point value for each open molding operation ( $PV_R$ ,  $PV_{PG}$ ,  $PV_{CG}$ ,  $PV_{TR}$ , and  $PV_{TG}$ ) included in the average in kilograms of HAP per megagram of material applied.
- $M_i$  = mass of resin or gel coat  $i$  used within an operation in the past 12 months in megagrams.
- $n$  = number of different open molding resins and gel coats used within an operation in the past 12 months.
- $PV_i$  = the MACT model point value for resin or gel coat  $i$  used within an operation in the past 12 months in kilograms of HAP per megagram of material applied.

The permittee must use the appropriate equations in the table below to calculate the MACT model point value ( $PV_i$ ) for each resin and gel coat used in each operation in the past 12 months.

For this operation—	And this application method—	Use this formula to calculate the MACT model plant value for each resin and gel coat—
1. Production resin, tooling resin	a. Atomized	$0.014 \times (\text{Resin HAP}\%)^{2.425}$
	b. Atomized, plus vacuum bagging with roll-out	$0.01185 \times (\text{Resin HAP}\%)^{2.425}$
	c. Atomized, plus vacuum bagging without roll-out	$0.00945 \times (\text{Resin HAP}\%)^{2.425}$
	d. Non-atomized	$0.014 \times (\text{Resin HAP}\%)^{2.275}$
	e. Non-atomized, plus vacuum bagging with roll-out	$0.0110 \times (\text{Resin HAP}\%)^{2.275}$
	f. Non-atomized, plus vacuum bagging without roll-out	$0.0076 \times (\text{Resin HAP}\%)^{2.275}$

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For this operation—	And this application method—	Use this formula to calculate the MACT model plant value for each resin and gel coat—
2. Pigmented gel coat, clear gel coat, tooling gel coat	All methods	$0.445 \times (\text{Gel coat HAP}\%)^{1.675}$

If the organic HAP emissions, as calculated in this condition, are less than the organic HAP limit calculated in Condition 3.B.3 for the same 12-month period, then the permittee is in compliance with the emission limit in Condition 3.B.3 for those operations and materials included in the average. (Ref.: 40 CFR 63.5701(a), 40 CFR 63.5710 and Table 3 of Subpart VVVV)

5.B.7 For Emission Points AA-101 and AA-102, the permittee must demonstrate compliance for any filled material on an as-applied basis using Equation 1 below:

(Eqn. 1) 
$$PV_F = PV_U \times \frac{(100 - \% \text{ Filler})}{100}$$

Where:

- $PV_F$  = The as-applied MACT model point value for a filled production resin or tooling resin in kilograms organic HAP per megagram of filled material.
- $PV_U$  = The MACT model point value for the neat (unfilled) resin, before filler is added, as calculated using the formulas in the table in Condition 5.B.6.
- % Filler = The weight-percent of filler in the as-applied filled resin system.

If the filled resin is used as a production resin and the value of  $PV_F$  calculated by Equation 1 of this condition does not exceed 46 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance. If the filled resin is used as a tooling resin and the value of  $PV_F$  calculated by Equation 1 of this condition does not exceed 54 kilograms of organic HAP per megagram of filled resin applied, then the filled resin is in compliance. If the permittee is including a filled resin in the emissions averaging procedure described in Condition 5.B.6, then the permittee shall use the value of  $PV_F$  calculated using Equation 1 of this condition for the value of  $PV_i$  in Equation 2 of Condition 5.B.6. (Ref.: 40 CFR 63.5714)

5.B.8 For Emission Points AA-101 and AA-102, in order to demonstrate compliance with the work practice standard in Condition 3.D.1, the permittee must visually inspect all mixing containers subject to this work practice standard at least once per month. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover. The permittee must keep records of which mixing containers are subject to this

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work practice standard and the results of the inspections, including a description of any repairs or corrective actions taken. (Ref.: 40 CFR 63.5731(c-d))

- 5.B.9 For Emission Points AA-101 and AA-102, in order to demonstrate compliance with the requirements for resin and gel coat application cleaning equipment found in Condition 3.B.4, the permittee shall determine and record the organic HAP content of the cleaning solvents subject to the standards specified in Condition 3.B.4 using the methods specified in Condition 5.B.2. If the permittee recycles cleaning solvents on-site, the permittee may use documentation from the solvent manufacturer or supplier or a measurement of the organic HAP content of the cleaning solvent as originally obtained from the solvent supplier for demonstrating compliance, subject to the conditions in Condition 5.B.2 for demonstrating compliance with organic HAP content limits.

At least once per month, the permittee must visually inspect any containers holding organic HAP-containing solvents used for removing cured resin and gel coat to ensure that the containers have covers with no visible gaps. Keep records of the monthly inspections and any repairs made to the covers. (Ref.: 40 CFR 63.5737)

- 5.B.10 For Emission Point AA-103, in order to demonstrate compliance with Condition 3.B.5, the permittee must determine and record the organic HAP content of the carpet and fabric adhesives using the methods in Condition 5.B.2. (Ref.: 40 CFR 63.5740(b))

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C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Reporting Requirement
AA-000	11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.C.1	VOC	Semi-annual reporting requirements
AA-100	40 CFR Part 63, Subpart VVVV (§63.5761)	5.C.2	HAPs	Notification requirements
	40 CFR Part 63, Subpart VVVV (§63.5764)	5.C.3		Reporting requirements

- 5.C.1 For the entire facility (AA-000), the permittee shall submit semi-annual reports providing:
- (a) Identification of and the total quantity used of each coating, adhesive, solvent, or other VOC containing material used on a monthly basis and in any consecutive 12-month period.
  - (b) The VOC content of each coating, adhesive, solvent or other VOC containing material used. A description of the method used to determine the VOC content shall accompany this data.
  - (c) The density of each coating, adhesive, solvent or other VOC containing material, unless material usages are measured in lbs.
  - (d) The total gallons of each coating, solvent or other VOC containing material used in any consecutive 12-month period.
  - (e) The total VOC emission rate in tons/year for each consecutive 12-month period.
  - (f) The report shall be submitted no later than 30 days from the semi-annual periods ending June 30 and December 31 in accordance with Condition 5.A.4 of the federally enforceable permit herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

- 5.C.2 For Emission Point AA-100, the permittee shall submit all applicable notifications listed in Table 7 of 40 CFR 63, Subpart VVVV, by the dates specified in the table. If the permittee changes any information submitted in any notification, the permittee shall submit the changes in writing to the MDEQ within 15 calendar days after the change.  
 (Ref.: 40 CFR 63.5761)
- 5.C.3 For Emission Point AA-100, the permittee shall comply with the following reporting requirements specified in paragraphs (a) and (b) of this condition. To the extent

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possible, the permittee shall organize each report according to the operations covered by Subpart VVVV and the compliance procedure followed for that operation.

- (a) the permittee shall submit each report by the dates in subparagraphs (i) and (ii) below.
  - (i) Each subsequent compliance report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31.
  - (ii) Each subsequent compliance report shall be postmarked or delivered no later than 60 calendar days after the end of the semiannual reporting period.
- (b) The compliance report shall include the information specified in subparagraphs (i) through (vii) below.
  - (i) Company name and address.
  - (ii) A statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the report.
  - (iii) The date of the report and the beginning and ending dates of the reporting period.
  - (iv) A description of any changes in the manufacturing process since the last compliance report.
  - (v) A statement or table showing, for each regulated operation, the applicable organic HAP content limit, application equipment requirement, or MACT model point value averaging provision with which the permittee is complying. The statement or table shall also show the actual weighted-average organic HAP content or weighted-average MACT model point value (if applicable) for each operation during each of the rolling 12-month averaging periods that end during the reporting period.
  - (vi) If the permittee was in compliance with the emission limits and work practice standards during the reporting period, the permittee shall include a statement to that effect.
  - (vii) If the permittee deviated from an emission limit or work practice standard during the reporting period, the permittee shall also include the information listed in (A) through (E) in the semiannual compliance report.
    - (A) A description of the operation involved in the deviation.
    - (B) The quantity, organic HAP content, and application method (if relevant) of the materials involved in the deviation.
    - (C) A description of any corrective action the permittee took to minimize the deviation and actions the permittee took to prevent it from happening again.

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- (D) A statement of whether or not the permittee was in compliance for the 12-month averaging period that ended at the end of the reporting period.

(Ref.: 40 CFR 63.5764(a-c))

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## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

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## SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://www.ecfr.gov/> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or

- (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.

7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:

- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
- (b) Any person disposing of halons;
- (c) Manufacturers of halon blends; or
- (d) Organizations that employ technicians who service halon-containing equipment.

# APPENDIX A

## List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3. Episodes	Regulations for the Prevention of Air Pollution Emergency
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound